

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

<b>In the Matter of</b>	)	
	)	
<b>Review of the Commission's Broadcast and</b>	)	<b>MM Docket No. 98-204</b>
<b>Cable Equal Employment Opportunity</b>	)	
<b>Rules and Policies</b>	)	

**To:   The Commission**

**COMMENTS OF THE TRINITY BROADCASTING NETWORK**

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<b>Rules and Policies</b>	)	

**To:   The Commission**

**COMMENTS OF RELIGIOUS BROADCASTERS**

**EXECUTIVE SUMMARY**

The Commission intends to continue with enforcement of equal employment opportunity regulations, and to revitalize its program of compulsory outreach activities. See Second Notice of Proposed Rule Making, (“SNPRM”) MM Docket No. 98-204. The Commission should abandon its intention and refrain from the undertaking. Unless it does so, the Commission will place itself in a collision course with important federal constitutional and statutory rights of religious licensees.

The Trinity Christian Center of Santa Ana, Inc, d/b/a Trinity Broadcasting Network, and its direct affiliates, oppose the SNPRM. Under the revitalized regulatory framework, their right to define their religious essence will be substantially burdened, as a consequence of the outreach and record-keeping requirements. And, the regulatory framework will lead to excessive entanglement by the Commission in their wholly religious and spiritual affairs. Finally, compliance with the rule would compel them to surrender their message for the Commission’s. In each respect, the injuries threatened are grave and of constitutional or statutory moment.

## **INTRODUCTION**

Trinity Christian Center of Santa Ana, Inc., d/b/a Trinity Broadcasting Network,<sup>1</sup> (hereinafter, “Religious Broadcasters”), by their attorney, and in accord with 47 C.F.R. §§ 1.415 and 1.419, present the following comments in opposition to portions of the Second Notice of Proposed Rule Making FCC 01-363, released December 21, 2001, (“SNPRM”) in the above-captioned matter.

Religious Broadcasters are licensees of the Federal Communications Commission. But before that, they are followers of Christ.<sup>2</sup> For them, the Gospel presents no justification or excuse for holding any view but that, in Christ, “there is neither Jew nor Greek . . . neither male nor female: for ye are all one in Christ Jesus.” See Galatians 3:28.<sup>3</sup> This view is not of their

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1. See Exhibit 1 annexed hereto listing the licenses and direct affiliates of the Trinity Broadcasting Network.

2. The Religious Broadcasters operate, in fact, as churches. In doing so, they carry out the ordinary and customary sacerdotal functions that serve as the hallmarks, for administrative consideration, of churches. So while the Commission may seek to impose a new gloss of regulation via the SNPRM on the Religious Broadcasters as corporate licensees of the Commission, the Commission must remember that its regulatory burdens and reaches are directed at churches.

3. See also Romans 10:12 (“For there is no difference between the Jew and the Greek: for the same Lord over all is rich unto all that call upon him”); I Corinthians 1:24 (“But unto them which are called, both Jews and Greeks, Christ the power of God, and the wisdom of God”).

creation. It is a fundamental teaching of their faith on the relationship among believers. The Religious Broadcasters do not contend that invidious discrimination has never occurred in either religious institutions or local houses of worship. They do assert that the practice of treating others differently in employment opportunities because of race considerations, ethnic variations, or gender cannot be justified doctrinally in the Christian faith.

Just as importantly for Christians is Christ's command to not be "unequally yoked with unbelievers." See II Cor. 3:14. The meaning of the illustration could not be clearer. The yoke is used to harness the labor of paired beasts of burden. In this metaphor, Paul explains that when one who follows Christ is put to labor in a yoke with another who does not follow Christ, the value of the yoke is lost because the capacity to work toward the common goal is lost because of the absence of any shared purpose or method. So the body of Christ has always defined itself and its members in accord with the lights of Scripture. And here, the religious broadcasters have done, and continue to do, likewise.

Defining religious identity is neither invidious discrimination nor a heretofore unknown affect of the right to the free exercise of religion. While, in some ways, the right is much the same as the right of any private group or association to identify itself and its membership, the right of a religious body to define itself is anchored by both the right to freedom of association and by the right to free exercise.

# **RELIGIOUS BROADCASTERS OPPOSE THE SNPRM BECAUSE IT FAILS TO ACCORD LEGAL AND CONSTITUTIONALLY REQUIRED LIBERTY TO THEIR RELIGIOUS IDENTITY AND SPEECH**

## **SUMMARY**

The opposition expressed by the Religious Broadcasters in these comments is not motivated by the purpose of endorsing invidious racial, ethnic, or gender discrimination. As we have explained, Religious Broadcasters find themselves as they find all others: equal at the foot of the cross. For Religious Broadcasters, the problems with the SNPRM begin with the Commission's serious failure to account for, and give a wholesome space of regulatory distance to, the Religious Broadcasters' federal constitutional and statutory rights.

Specifically, instead of that wide berth, the Commission would use the SNPRM to compel Religious Broadcasters to meet equal employment opportunity requirements by efforts at recruiting "widely among . . . co-religionists."<sup>4</sup> To enforce that requirement, the Commission would use the SNPRM to burden the work of the Religious Broadcasters by imposing on them reporting requirements<sup>5</sup> and, presumably, a certification requirement.<sup>6</sup> Just as disturbing is the threat embodied in the Commission's SNPRM to do injury to the Religious Broadcasters' rights of religious autonomy and associational freedom, a threat which inheres in a regulatory system

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4. See SNPRM ¶ 22.

5. See SNPRM ¶ 33-47.

6. In the SNPRM, the Commission failed to state that Religious Broadcasters would not be subject to the requirements of these subparagraphs. So, Religious Broadcasters are compelled to assume that they will be made the subject of these requirements.

of required record-keeping.

The Religious Broadcasters object to provisions of the SNPRM because compliance with those provisions substantially burden their religious practices in the absence of coordinate compelling government interest served by the least restrictive available means. Consequently, the challenged provisions put the Commission in the unfortunate position of violating the proscriptions of the Religious Freedom Restoration Act, Title 42 U.S.C. § 2000-bb, et seq. Moreover, enforcement activities by the FCC would constitute excessive entanglement in the religious life of the Religious Broadcasters. Finally, Religious Broadcasters object to the challenged provisions because they impose unconstitutionally on their constitutional right of freedom of association.



**I. ENFORCEMENT OF THE PROPOSED NONDISCRIMINATION RULES WILL VIOLATE RELIGIOUS BROADCASTERS' RIGHTS UNDER THE RELIGIOUS FREEDOM RESTORATION ACT.**

By its enactment of the Religious Freedom Restoration Act, Title 42 U.S.C. § 2000-bb, et seq., (hereinafter “RFRA”), Congress amended the organic legislation that created the Commission and specifically limited federal agencies and actors with a duty of respect for the freedom of religious adherents. RFRA’s protection extends both to practices that are mandated by a religion (that is, central to the religion) and to practices that are merely motivated by a religion.<sup>7</sup> RFRA bars the Commission from substantially burdening a religious practice in the absence of a compelling government interest served by the least restrictive means.<sup>8</sup> Here, the SNPRM imposes a substantial burden on the Religious Broadcasters because it interferes with their internal, inherently religious process of self-definition and burdens their work with recruiting, reporting, and certification requirements. But this substantial burdening is not justified by any compelling interest of the Commission. Moreover, the SNPRM does not employ the least restrictive means available to it for the accomplishment of any proper interest of the Commission.

The Religious Broadcasters claim the right to define their faith, against the Commission’s

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7. See Religious Land Use and Institutionalized Persons Act of 2001, Title 42 U.S.C. § 2000-cc(5), Public Law 106-274, § 8(7)(A), amending RFRA.

8. See Title 42 U.S.C. § 2000bb-2.

participation in such a definition, or vaunting over the Religious Broadcasters of the Commission's judgments about whether a potential employee meets the definition of the Religious Broadcasters' faith (a "co-religionist"). Deciding questions of faith commitment, and admission to the community of believers is at the center of religious belief. By means of the SNPRM, the Commission puts in place a mechanism that will lead, inevitably, to the deterioration of this essential right of the Religious Broadcasters.

In essence, the Commission asserts the power to ghostwrite the creeds and statements of faith that the Religious Broadcasters have used to identify their distinctive character. In so doing, the Commission will lay over those very creeds a skin of government thought about sublimely spiritual and religious matters. Such a skin, though it seems thin in the estimation of the SNPRM, is, in fact, a substantial burden on the Religious Broadcasters. Simply put, the Constitution leaves no space in the venture of religious bodies such as the Religious Broadcasters for the Commission or other government bodies to judge whether someone is, or is not, a co-religionist – that is something only the religious body itself can decide.

The Commission's further regulatory and adjudicatory activities following on the adoption of the SNPRM will mount up in administrative process and litigation, one consequence of which will be that the Religious Broadcasters and their records will be subjected "to subpoena, discovery and cross examination."<sup>9</sup> Such invasions in the sphere of religious autonomy are themselves devastating, but they are a harm that does not travel quietly or alone. Instead, the mere threat that such consequences will follow would have a chilling effect on the

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9. EEOC v. Catholic University of America, 83 F.3d 455, 467 (D.C. Cir. 1996) (citations omitted).

religious choices of the Religious Broadcasters. Given the certainty of administrative proceedings and litigation at great cost, the capacity of many to resist the Commission's attempts to interfere with definition of the faith will be seriously diminished. In this light, the SNPRM is clearly a substantial burden: "the imposition of secular [Commission] standards on a church's employment . . . will burden the free exercise of religion."<sup>10</sup>

Congress never intended that the Commission have such a deleterious impact on the autonomy of religious bodies. If that was ever a possible interpretation of legislative action, the enactment of RFRA made plain the intent of Congress that federal agencies, including the Commission, not so burden them. The only exception to that rule is when the government acts in service of a compelling interest and does so using the least restrict means. Here, however, there is no compelling government interest supporting the Commission's imposition of the SNPRM on the Religious Broadcasters.

The matching of the religious autonomy interests of the Religious Broadcasters against the Commission's purpose of addressing employment discrimination is not even close: "the state's interest in eliminating employment discrimination is outweighed by a church's constitutional right of autonomy in its own domain."<sup>11</sup> Rather than a clearly established compelling interest, the only thing that the Commission offers in support of the SNPRM is a mere fear,<sup>12</sup> quite inappropriately stated, that entities such as the Religious Broadcasters actively

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10. Id. at 467.

11. 83 F.3d at 467.

12. Cf. Tinker v. Des Moines Ind. School Dist., 393 U.S. 503, (1969) ("But, in our system, undifferentiated fear or apprehension . . . is not enough to overcome the right to freedom of expression").

discriminate against minority races and ethnicities by “simply replicat[ing] itself through an insular recruitment and hiring process.”<sup>13</sup>

The Commission’s intuitive but unsupported working hypothesis is not a compelling government interest. It is a suspicion, a guess, and nothing more.

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13. See SNPRM ¶ 15.

But even if the suspicion were considered the embodiment of a compelling government interest, the Commission's enactment of SNPRM and subsequent administrative enforcement of it would fail to satisfy the requirements of RFRA because the rules and regulations contemplated under the SNPRM are not the least restrictive means to further the compelling government interest. It is a solution in search of a problem. As such, it can never be narrower than leaving well enough alone. Worse, it trenches threateningly on an instance of the unconstitutional conditions doctrine.<sup>14</sup>

The SNPRM attacks across a wide field of activities of the Religious Broadcasters, including self-definition of a religiously autonomous entity, hiring, recruiting and outreach. But the Commission's SNPRM does not proceed from the sound foundation of an identified, articulable and proven problem. Consequently, it is a certainty that the means used will not be measured to fit closely to any problem. As a result, the Commission cannot rationally conclude that its imposition of the regulatory framework identified in the SNPRM will be by the least restrictive means available to it. Instead, in a mirror of the old adage, "he that would beat a dog can easily find a stick," the SNPRM will position the Commission to proceed by whatever means are at hand, rather than those best inclined to give a respectful birth to the exercise of religious liberties.

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14. See Regan v. Taxation with Representation, 461 U.S. 540, 545 (1983).

**II. ENFORCEMENT OF THE PROPOSED NONDISCRIMINATION  
REGULATIONS WOULD THRUST THE COMMISSION INTO THE HEART  
AND SOUL OF RELIGIOUS BROADCASTERS IN AN UNAVOIDABLE,  
EXCESSIVE ENTANGLEMENT IN THE RELIGION OF THE RELIGIOUS  
BROADCASTERS.**

To withstand an Establishment Clause challenge, a state statute, policy or action (1) must have a secular purpose; (2) must, as its primary effect, neither advance nor inhibit religion; and (3) must not foster an excessive government entanglement with religions.<sup>15</sup> Here, the Commission's SNPRM will effectively vault the Commission over the Religious Broadcasters in the broadcasters' search for, and answer to, entirely spiritual questions of faith, doctrine and

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15. See Lemon v. Kurtzman, 403 U.S. 602, 612-13 (1971); Bowen v. Kendrick, 487 U.S. 589, 602 (1988) (statute facially invalid under Establishment Clause only if, inter alia, law's "primary effect" is advancement of religion, or if it requires "excessive entanglement" between church and state). As Justice Blackmun explained it, Chief Justice Burger's opinion for the Court in Lemon was the result of his survey of the Court's Establishment Clause decisions. See Lee v. Weisman, 505 U.S. 577, 603 (1992) (Blackmun, J., concurring). As Justice Blackmun interpreted the excessive entanglement prong,

The final prong, excessive entanglement, was a focus of Walz v. Tax Comm'n of New York City, [] but harkens back to the final example in Everson: 'Neither a state nor the Federal Government can, openly or secretly, participate in the affairs of any religious organizations or groups and vice versa.' The discussion in Everson reflected the Madisonian concern that secular and religious authorities must not interfere with each other's respective spheres of choice and influence.

505 U.S. at 603 (citations omitted; emphasis added).

admission to the community of believers. In so doing, the SNPRM positions the Commission regrettably squarely in the midst of these issues, and it will compel the Commission to examine and decide such wholly religious matters. In doing so, the Commission will trespass upon the Establishment Clause.

The problem is patent. The Religious Broadcasters will be compelled by the SNPRM to engage in approved outreach activities and to maintain and perhaps submit records related to outreach and employee identity. The Commission's enforcement and oversight activities would require the Commission to do one of two things; either to accept the Religious Broadcasters' definition of their faith and of "co-religionists," or to decide for itself what the faith of the Religious Broadcasters is, and whether, given such definition, whether the Religious Broadcasters have complied with the requirements imposed by the SNPRM.

What would that Commission process look like? Will the Commission take the Religious Broadcasters at their word, regarding the nature of their faith identity and scruples? Will the Commission reach beyond the familiar determination of whether religious beliefs are sincerely held and begin down a path of deciding whether particular beliefs are valid, or important to a faith? If the Religious Broadcasters do not endorse infant baptism, or if they accept women in pastoral ministry, will the Commission conduct an inquiry into particular employment and outreach decisions to see if they were consonant with a version of faith understood by the Commission but not held by the Religious Broadcasters? Of course, reaching conclusions on these questions is not the only problem presented by the course of the Commission's SNPRM. Because, "it is not only the conclusions that may be reached . . . which may impinge on rights guaranteed by the Religion Clauses, but also the very process of inquiry leading to findings and



conclusions.”<sup>16</sup>

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16. See NLRB v. Catholic Bishops of Chicago, 440 U.S. 490, 502 (1979).

Of course, the Commission will inevitably be compelled to express itself in regulations that draw specific lines across the question of wide outreach and the duties of broadcasters, such as the Religious Broadcasters, whose activities are born out of their religious faith. Such regulations will either satisfy the minimum regulatory requirements<sup>17</sup> because they take steps toward defining the category of co-religionists for the Religious Broadcasters, or they will suffer from the very arbitrariness that dooms administrative action. To avoid that latter circumstance, if the Commission proceeds with the SNPRM, then it will be compelled to engage in a line drawing with respect to the Religious Broadcasters that is prohibited to it.

The Supreme Court explained more than thirty years ago:

The [test] which [the Georgia courts] appl[y] requires the civil judiciary to determine . . . whether the issue on which the general church has departed holds a place of . . . importance in the traditional theology . . . . A civil court can make this determination only after assessing the relative significance to the religion of the tenets from which departure was found. Thus, the . . . Georgia . . . theory requires the civil court to determine matters at the very core of a religion -- the interpretation of particular church doctrines and the importance of those doctrines to the religion. Plainly, the First Amendment forbids civil courts from playing such a role.<sup>18</sup>

As the Court held, “[i]t is wholly inconsistent with the American concept of the relationship

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17. That is, that such regulations not be arbitrary and capricious. See Title 5 U.S.C. § 706.

18. Presbyterian Church in U.S. v. Mary Elizabeth Blue Hull Mem. Presbyterian Church, 393 U.S. 440, 449-50 (1969).

between the church and state to permit civil . . . authorities to determine ecclesiastical questions.”<sup>19</sup> So, in essence, with its announcement of the SNPRM, the Commission has announced its intention to put itself into an unavoidable Catch-22 between its statutory obligations of clarity and the constitutional proscription on engaging in an assay of matters at the core of the Religious Broadcasters’ essence.<sup>20</sup>

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19. Id. at 445.

20. Just two terms ago, the Supreme Court reiterated the offensive nature of such assays, when it repeated its instruction that government agencies should “refrain from trolling through a person or institution’s religious beliefs.” Mitchell v. Helms, 530 U.S. 793, 828 (2000) (citing case).

**III. THE PROPOSED NONDISCRIMINATION REGULATIONS BURDEN  
RELIGIOUS BROADCASTERS' CONSTITUTIONAL RIGHTS TO FREEDOM  
OF ASSOCIATION.**

Not only is it an exercise of religion to select members according to group defining characteristics, it is an exercise in protected expression. Examples abound to illustrate this principle. For example, by limiting admission to the National Honor Society to those of high academic standing (along with other criteria), that organization expresses a view regarding academic excellence. By requiring that students who participate in a team sport maintain a minimum passing average, a school sends a related but different message regarding the importance of academic excellence. In these and countless other ways, private groups and associations, and public entities, define themselves and express their views.

So, in Hurley v. Irish-American Gay Lesbian and Bisexual Group of Boston, 515 U.S. 559 (1995), where the Court rhetorically inquired, “whether Massachusetts may require private citizens who organize a parade to include among the marchers a group imparting a message the organizers do not wish to convey,” 515 U.S. at 559, it resoundingly responded, no. “We hold that such a mandate violates the First Amendment.” Id. Certainly here, where the Commission’s proposed rule-making would effectively compel Religious Broadcasters to employ those who do not share their religious faith and ideology, the mandate also “violates the First Amendment.” Hurley illuminates how the make-up of a group (and, thus, the identity of the group) contribute to and shape the group’s message.

The Commission’s proposed rule-making puts it into inevitable conflict with Religious Broadcaster’s constitutional authority to decide for themselves their identity as a religious group.

“Religious freedom encompasses the power of religious bodies to decide for themselves, free from state interference, matters of church government as well as those of faith and doctrine.” Serbian Orthodox Diocese v. Milivojevic, 426 U.S. 696, 722 (1976). But, in addition, there is, in determining such matters as identity and participation, an exercise of the right to freedom of speech. Such selections reflect and influence the nature and identity of the group, and are an important aspect of the speaker’s autonomy.

Under [the Supreme Judicial Court’s] approach any contingent of protected individuals with a message would have the right to participate in petitioners’ speech, so that the communication produced by the private organizers would be shaped by all those protected by the law who wished to join in with some expressive demonstration of their own. But this use of the State’s power violates the fundamental rule of protection under the First Amendment, that a speaker has the autonomy to choose the content of his own message.

515 U.S. at 573.

The Religious Broadcasters’ free speech and freedom of association rights are much the same as those of the parade organizers in Hurley. There, the Supreme Court noted a simile between composers and parade organizers which is apt here:

[L]ike a composer, the Council selects the expressive units of the parade from potential participants, and though the score may not produce a particularized message, each contingent’s expression in the Council’s eyes comports with what merits celebration on that day. . . . [T]he Council clearly decided to exclude a message that it did not like from the communication it chose to make, and that is enough to invoke its right as a private speaker to shape its expression by speaking on one subject while remaining silent on another.

515 U.S. at 574. Here, the Religious Broadcasters have the right to, and desire to, select

employees from a pool reflecting their religious identities, including only such potential participating employees whose faith commitments make them suitable to service with Religious Broadcasters. That choice will be frustrated by enforcement of the proposed rule-making.

The Religious Broadcasters' rejection of the application and results of the proposed rule-making policy is soundly supported by constitutional principles. The Commission should not attempt to compel Religious Broadcasters, who must always be on guard to please the Commission, to hire any they sincerely believe does not share their religious convictions. To avoid conflict with the Commission and the potential loss of their licenses, all that the Religious Broadcasters must do is accede to the SNPRM, surrender the right to define their message, and promote the Commission's message. With the SNPRM, the Commission has forgotten that "whatever the reason, it boils down to the choice of a speaker not to propound a particular point of view, [which] choice is presumed to lie beyond the government's power to control." Hurley, 515 U.S. at 575.

The selection of employees by the Religious Broadcasters, like the selection of parade participants for the St. Patrick's Day Parade, communicates a message and, as the Supreme Court noted, "every participating unit [in a parade] affects the message conveyed by the private organizers . . . ." 515 U.S. 572-73. By maintaining their discrete religious identities and requiring that employees share in that religious identity as a condition of employment, the Religious Broadcasters have demonstrated commitments to the religious faith they propound and, at the same time, have expressed to others the importance of that commitment. The application of the requirements of the SNPRM to Religious Broadcasters would abridge their associational freedom and associational expression rights, and should not be adopted

## **CONCLUSION**

The Religious Broadcasters respectfully suggest, because of the well-established principles described above, that the Commission relinquish its proposed rule making as it applies to them and other religious broadcasters. In doing so, the Commission will properly respect the guarantees of the Constitution and of RFRA. Because the proposed rules would create a regime injurious to the religious and associational rights of the Religious Broadcasters that is unnecessary to any proper purpose of the Commission, the Commission will not be derelict in the completion of its statutory duties by doing so.

Respectfully submitted,

**TRINITY CHRISTIAN CENTER OF SANTA  
ANA, INC., *et al.*,**

*by their counsel*

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April 15, 2002

## **EXHIBIT 1**



## TRINITY LIST OF AUTHORIZATIONS

### 1. TRINITY CHRISTIAN CENTER OF SANTA ANA

<u>1.</u>	<u>Full Power</u>		<u>Facility ID No.</u>
1.	WTJP	Gadsden, Alabama	1002
2.	WMPV-TV	Mobile, Alabama	60827
3.	WMCF-TV	Montgomery, Alabama	60829
4.	KTBN	Santa Ana, California	67884
5.	WELF	Dalton, Georgia	60825
6.	WHSG	Monroe, Georgia	68058
7.	KAAH	Honolulu, Hawaii	3246
8.	WWTO-TV	LaSalle, Illinois	998
9.	WBUY	Holly Springs, Mississippi	60830
10.	KTAJ	St. Joseph, Missouri	999
11.	KNAT-TV	Albuquerque, New Mexico	993
12.	WDLI	Canton, Ohio	67893
13.	KDOR	Bartlesville, Oklahoma	1005
14.	WPGD	Hendersonville, Tennessee	60820
2.	<u>International Shortwave</u>		
1.	KTBN1	Salt Lake City, Utah	67913
3.	<u>TV Boosters</u>		
1.	KTBN1	Lake Arrowhead, California	91765
4.	<u>Low Power</u>		
1.	W51BY/W46CY	Birmingham, Alabama	990
2.	W22BF/W66DH	Decatur, Alabama	995

3.	W41BN/W23BY	Dothan, Alabama	67925
4.	W30BD	Eufaula, Alabama	58773
5.	W57BV	Florence, Alabama	986
6.	W67CO	Huntsville, Alabama	989
7.	W66CN	Jasper, Alabama	1012
8.	W18CD	Opelika, Alabama	60822
9.	W64BJ	Scottsboro, Alabama	67953
10.	W24CK	Selma, Alabama	60831
11.	W46BU	Tuscaloosa, Alabama	1008
12.	K20CZ/K61HA	Bullhead City, Arizona	67974
13.	K41ER	Globe, Arizona	67966
14.	K38CX	Shonto/Tonalea, Arizona	68020
15.	K42BS	Fayetteville, Arkansas	67933
16.	K27DI/K16ER	Fort Smith, Arkansas	67875
17.	K44EV	Hot Springs, Arkansas	60834
18.	K54ER	Jonesboro, Arkansas	60836
1.			
19.	K43CJ	Mountain Home, Arkansas	68046
20.	K27FC	Paragould, Arkansas	60832
21.	K55CN	Bakersfield, California	67922
22.	K53FT	Chico/Paradise, California	68097
23.	K42DT	Coalinga, California	68091
24.	K26FO	Daggett, California	11529
25.	K60BB	Desert Hot Springs, California	67892

26.	K47EH	Eureka, California	67987
27.	K54DN	Lancaster, California	67901
28.	K33DK	Lucerne Valley, California	14153
29.	K28EM	Mariposa, California	67894
30.	K49EO	Modesto, California	68022
31.	K53DT	Monterey, California	68025
32.	K66BM	Palm Springs, California	68071
33.	K15CO	Porterville, California	68010
34.	K65DJ	Redding, California	68088
35.	K69FB	Sacramento, California	67970
36.	K15DB	Santa Barbara, California	67978
37.	K38EE	Twentynine Palms, California	67991
38.	K45DU	Ventura, California	67963
39.	K33BT	Victorville, California	67932
40.	K33DN/K48FW	Denver, Colorado	67997
41.	K66FB	Denver, Colorado	68001
42.	K25FZ	Grand Junction, Colorado	70103
43.	K48CG	Loveland, Colorado	68077
44.	W68CQ/W14CM	Dover, Delaware	67977
45.	W67BY/W38CO	Fort Myers, Florida	68028
46.	W23AQ	Lake City, Florida	68000
47.	W56DW	Naples, Florida	67888
48.	W68CM/W54CU	Panama City, Florida	67962
49.	W52CN/W17CK	Port Charlotte, Florida	67946

50.	W60BK/W36CO	St. Petersburg, Florida	67986
51.	W60CE	Sebring, Florida	67919
52.	W68CF	Tampa, Florida	68014
53.	W23AC/W61DF	Albany, Georgia	67944
54.	W65BI/W58CZ	Augusta, Georgia	67874
1.			
55.	W33AL	Brunswick, Georgia	67887
56.	W52CL	Macon, Georgia	67972
57.	W55BM	Marietta, Georgia	68093
58.	W67BJ	Savannah, Georgia	68004
59.	W48BH	Statesboro, Georgia	43275
60.	W33BX	Tifton, Georgia	67931
61.	W25CP	Valdosta, Georgia	68034
62.	W54CW	Waycross, Georgia	67881
63.	K47BE	Boise, Idaho	68023
64.	K53FF	Coeur D'Alene, Idaho	67984
65.	K26EW	Idaho Falls, Idaho	68635
66.	K15DG	Pocatello, Idaho	67918
67.	K25EV	Twin Falls, Idaho	68096
68.	W22AJ	Arlington Heights, Illinois	68061
69.	W64BK/W51CT	Bloomington, Illinois	1007
70.	W58DA	Champaign, Illinois	68045
71.	W29BG	Decatur, Illinois	67930
72.	W29BN	Elgin, Illinois	67898

73.	W50BY/W53CB	Galesburg, Illinois	1013
74.	W36A0	Palatine, Illinois	68043
75.	W41BO	Peoria, Illinois	994
76.	W62BV/W25CL	Rockford, Illinois	988
77.	W52BI	Sterling-Dixon, Illinois	1006
78.	W18CF	Elkhart, Indiana	67973
79.	W38BK	Evansville, Indiana	68070
80.	W57DC	Lafayette, Indiana	68002
81.	W65BK/W43BV	Terre Haute, Indiana	68035
82.	K17ET	Cedar Rapids, Iowa	68067
83.	K61HD	Davenport, Iowa	68036
84.	K62FU	Muscatine, Iowa	47084
85.	K42AM	Ottumwa, Iowa	67883
86.	K44FK	Waterloo, Iowa	67879
87.	K43ER/K54GC	Independence, Kansas	1016
88.	K25DS	Junction City, Kansas	68005
89.	K31BW	Manhattan, Kansas	67975
90.	K15CN	Salina, Kansas	68040
1.			
91.	K21AP/K55IL	Topeka, Kansas	68051
92.	K59DA	Wichita, Kansas	67886
93.	W33BK	Corbin, Kentucky	67968
94.	W65CX/W39CJ	Elizabethtown, Kentucky	21840
95.	W22CH	Hopkinsville, Kentucky	68049

96.	K64FT	Alexandria, Louisiana	28757
97.	K56DR/K58GB	Baton Rouge, Louisiana	67896
98.	K45DI	Mermentau, Louisiana	68069
99.	K59GI	Monroe, Louisiana	70101
100.	K49DE	New Iberia, Louisiana	67907
101.	K59DG	New Orleans, Louisiana	67939
102.	K59GO	Shreveport, Louisiana	67909
103.	W17BF/W36CK	Bangor, Maine	14333
104.	W17BJ	Danforth, Maine	14332
105.	W27CE	Dover/Foxcroft, Maine	14331
106.	W21BI	Farmington, Maine	14334
107.	W17BN	Madawaska, Maine	14336
108.	W14BO/W34CN	Medway, Maine	14335
109.	W51AG	Presque Isle, Maine	47483
110.	W47CL (CP)	York Center, Maine	67960
111.	W43BP	Cresaptown, Maryland	68024
112.	W67DF	Springfield, Massachusetts	67980
113.	W18BT	Alpena, Michigan	67049
114.	W66BV	Detroit, Michigan	67923
115.	K58CM	Duluth, Minnesota	67908
116.	K58BS	Minneapolis, Minnesota	67955
117.	K60DS	Rochester, Minnesota	67929
118.	K19BG	St. Cloud, Minnesota	68054
119.	W35BM	Biloxi, Mississippi	67942

120. W25AD	Columbus, Mississippi	68080
121. W25BA	Grenada, Mississippi	68056
122. W33BH	Greenville, Mississippi	68089
123. W36AC	McComb, Mississippi	68072
124. W47CG	Meridian, Mississippi	67937
125. W59DK	Natchez, Mississippi	67995
126. W51CU	Pascagoula, Mississippi	67989
1.		
127. K56AU	Columbia, Missouri	67915
128. K39CP	Poplar Bluff, Missouri	68030
129. K49DG	Springfield, Missouri	68092
130. K52DH/K41FQ	Springfield, Missouri	67916
131. K34BR	St. Charles, Missouri	68065
132. K18BT	St. Louis, Missouri	68055
133. K53DW	Great Falls, Montana	67965
134. K41CX	Helena, Montana	67928
135. K26DD	Kalispell, Montana	67877
136. K42EO	Missoula, Montana	68636
137. K39AJ/K58GD	Lincoln, Nebraska	68083
138. K52ES	Norfolk, Nebraska	68018
139. K26CV	Ogallala, Nebraska	67899
140. K19CU	Carson City, Nevada	67952
141. K57FA	Las Vegas, Nevada	67876
142. K45AV	Reno, Nevada	67920

143.	W36BJ	Atlantic City, New Jersey	68044
144.	K18CT	Raton, New Mexico	67943
145.	W64BH	Albany, New York	67927
146.	W23BS	Binghamton, New York	68003
147.	W59DG	Elmira, New York	68090
148.	W14AZ/W47CM	Glens Falls, New York	68052
149.	W10BH	Jamestown, New York	67957
150.	W22AZ	Olean, New York	68012
151.	W41AE/W51CV	Utica, New York	67994
152.	W52CW	Charlotte, North Carolina	67967
153.	W66DF	Fayetteville, North Carolina	68079
154.	W59BA/W63CW	Goldsboro, North Carolina	68074
155.	W60CV	Greenville, North Carolina	67904
156.	W22CJ	Jacksonville, North Carolina	68008
157.	W67DU	Lumberton, North Carolina	67940
158.	W64CN	Raleigh, North Carolina	68084
159.	W53BF	Rocky Mount, North Carolina	67783
160.	W66BT	Statesville, North Carolina	67958
161.	W51CW	Wilmington, North Carolina	67945
162.	K46DY	Bismarck, North Dakota	3164
1.			
163.	K28EP	Dickinson, North Dakota	3160
164.	K56ET	Fargo, North Dakota	68013
165.	K49FF	Grand Forks, North Dakota	68048



166. K40DE	Williston, North Dakota	68087
167. W40AE/W59DL	Chillicothe, Ohio	67917
168. W61DE	Cincinnati, Ohio	68075
169. W51BI	Kirtland, Ohio	67934
170. W32AR	Lexington, Ohio	68017
171. W66CZ	Portsmouth, Ohio	68009
172. W47BC	Springfield, Ohio	68026
173. W39AI/W52CX	Youngstown, Ohio	68064
174. W36AY/W16BT	Zanesville, Ohio	67988
175. K44BQ	Ardmore, Oklahoma	68085
176. K27AZ	Lawton, Oklahoma	67912
177. K58EY/K25GJ	Muskogee, Oklahoma	1015
178. K45ER	Tahlequah, Oklahoma	1014
179. K33AG	Bend, Oregon	67951
180. K33AO	Coos Bay, Oregon	68060
181. K59DU	Grants Pass, Oregon	67992
182. K58BG	Klamath Falls, Oregon	68063
183. K21BC	Lakeview, Oregon	67979
184. K57EK	Medford, Oregon	67959
185. K14HA	Roseburg, Oregon	67903
186. W41CF	Altoona, Pennsylvania	6340
187. W48CH	Erie, Pennsylvania	68016
188. W52BO	Meadville, Pennsylvania	68082
189. W65CG	Pittsburgh, Pennsylvania	68062

190. W39BT/W11BC	Williamsport, Pennsylvania	67954
191. W18BF	Anderson, South Carolina	28783
192. W19CH	Beaufort, South Carolina	68027
193. W44AX	Charleston, South Carolina	67969
194. W66BJ/W34CQ	Myrtle Beach, South Carolina	68021
195. W55CQ	Orangeburg, South Carolina	70104
196. K35FJ	Aberdeen, South Dakota	67964
197. K38CQ	Huron, South Dakota	67905
198. K27DB	Madison, South Dakota	67900
1.		
199. K33CO	Rapid City, South Dakota	68066
200. K56GF	Sioux Falls, South Dakota	67998
201. K31DP	Yankton, South Dakota	68006
202. W57CZ	Cookeville, Tennessee	67990
203. W35AH	Jackson, Tennessee	68047
204. W60CF	Knoxville, Tennessee	68033
205. W61DG	Morristown, Tennessee	67926
206. W36AK	Nashville, Tennessee	60821
207. K51CK	Abilene, Texas	68059
208. K34FM	Austin, Texas	67880
209. K26AP	Brownwood, Texas	67948
210. K47ED	College Station, Texas	68029
211. K57FC	Corpus Christi, Texas	67938
212. K46DL/K56GE	Kingsville, Texas	67921

213.	K17BP	Palestine, Texas	68039
214.	K42DA	Paris, Texas	68081
215.	K44FJ	San Angelo, Texas	70099
216.	K20BW	San Antonio, Texas	68095
217.	K45FJ	San Antonio, Texas	68094
218.	K30EA	Texarkana, Texas	60814
219.	K15BV	Uvalde, Texas	68042
220.	K43DV	Victoria, Texas	68019
221.	K64CJ	Ogden, Utah	67891
222.	K39AK	Vernal, Utah	68053
223.	W16AL	Burlington, Vermont	67941
224.	W40BM	Lynchburg, Virginia	67890
225.	W49AP	Roanoke, Virginia	67996
226.	W24OI	Virginia Beach, Virginia	67889
227.	K23AS	Aberdeen, Washington	67956
228.	K55EB	Spokane, Washington	67936
229.	K34EM	Wenatchee, Washington	54348
230.	W45BW	Parkersburg, West Virginia	68037
231.	W49CB	Green Bay, Wisconsin	67885
232.	W19BH	Janesville, Wisconsin	68041
233.	W33AX/W38CT	Madison, Wisconsin	68073
234.	W17CF	Oshkosh, Wisconsin	67949
1.			
235.	W16BS	Sheboygan, Wisconsin	67976

	236.	W66DC	Waupaca, Wisconsin	67935
	237.	K35CN	Green River, Wyoming	68031
<b>2.</b>	<b><u>TRINITY BROADCASTING OF ARIZONA</u></b>			
	1.	<u>Full Powers:</u>		
	1.	KPAZ	Phoenix, Arizona	67868
	2.	<u>Low Powers</u>		
	1.	K58AV	Cottonwood, Arizona	67871
	2.	K35FH	Flagstaff, Arizona	67982
	3.	K57BD	Tucson, Arizona	67911
	4.	K56ED	Tucson, Arizona	67961
<b>3.</b>	<b><u>TRINITY BROADCASTING OF DENVER</u></b>			
	1.	<u>Low Powers</u>		
	1.	K57BT	Denver, Colorado	67872
<b>4.</b>	<b><u>TRINITY BROADCASTING OF FLORIDA, INC.</u></b>			
	1.	<u>Full Powers</u>		
	1.	WHFT	Miami, Florida	67971
<b>5.</b>	<b><u>TRINITY BROADCASTING OF INDIANA, INC.</u></b>			
	1.	<u>Full Powers</u>		
	1.	WKOI	Richmond, Indiana	67869
	2.	WCLJ	Bloomington, Indiana	68007
<b>6.</b>	<b><u>TRINITY BROADCASTING OF NEW YORK, INC.</u></b>			
	1.	<u>Full Powers</u>		
	1.	WTBY	Poughkeepsie, New York	67993

7. TRINITY BROADCASTING OF OKLAHOMA CITY, INC.

1. Full Powers

1.	KTBO	Oklahoma City, OK	67999
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8. TRINITY BROADCASTING OF TEXAS

9.

1. Full Powers

1.	KDTX	Dallas, Texas	67910
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10. TRINITY BROADCASTING OF WASHINGTON

1. Full Powers

1.	KTBW	Tacoma, Washington	67950
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